

REMARKS

Status of Claims

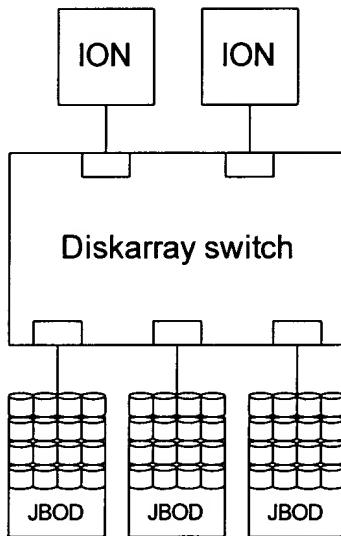
Claims 1-30 remain pending with claims 1, 11, 20, and 25 being independent.

Applicants have not amended the claims in this response.

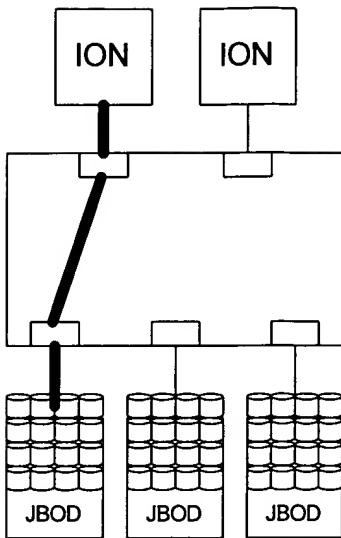
Claim 1, 11, & 20

Claim 1 currently recites a "a first switching device" to couple serverlets to shared I/O resources.

The Examiner rejected claim 1 based on a proposed a combination of Chow (6,148,349) and Matsunami (6,542,961) that connects the IONs and JBODs of Chow through a Diskarray switch of Matsunami. Applicants understand the Examiner's proposed combination to look something like:



As described in Matsunami, the Diskarray switch features a crossbar switch. Use of a crossbar switch in the proposed combination would create a path connecting a JBOD to an ION to service a JBOD access (as shown below).



During this period of time, due to the nature of a crossbar switch, the other ION is excluded from accessing the particular JBOD. This is the bottleneck identified by the Applicants in their previous response.

In response to this argument, the Examiner stated:

2. Applicant argued that the Matsunami reference teaches away from Chow due to a bottleneck in JBOD access. However, in Chow each ION device must have access to the JBODs (col. 8, lines 63-67), while Matsunami similarly allows for each host device to access all disk arrays (figs. 4 and 15; col. 12, line 66 through col. 13, line 1).

In particular, the portion of Chow cited by the Examiner states "at any given time both IONs 212 and 214 in a dipole 226 must be able to access all devices" (col. 8, lines 63-67). Chow achieves this continuous access by providing each ION with direct dedicated connections with each JBOD (see FIG. 1 of Chow). The use of Matsunami's crossbar switch would undermine this aspect of Chow that the Examiner acknowledges as an important feature. That is, the IONs would not be able to access all devices at any given time. Instead delays due to operation of the crossbar switch would force a given

ION to wait to access a JBOD until the needed path through the crossbar switch was available.

As such, Applicants position remains that one of skill in the art would not combine Chow and Matsunami in the manner proposed above. Applicants respectfully request withdrawal of the rejection of claim 1 and its independent claims. Similarly, Applicants respectfully request withdrawal of independent claims 11 and 20 and their respective independent claims.

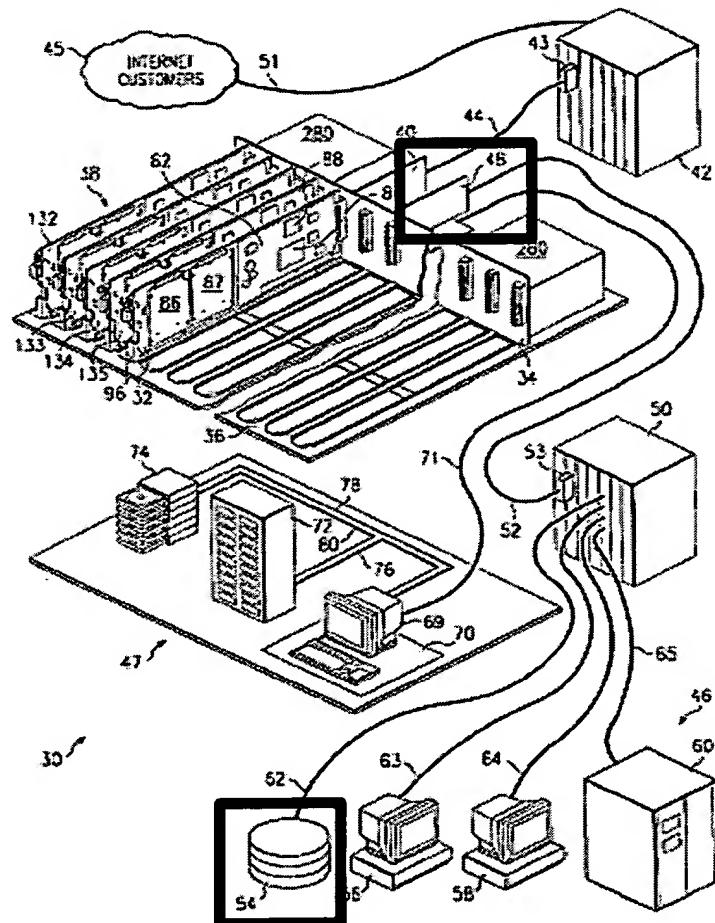
Claim 25

Claim 25 currently recites a system having multiple serverlets and a "switching device to couple the serverlets to at least one disk system shared by the serverlets **via a bus connecting the first switching device and the at least one disk system**". For example, FIG. 7 and the corresponding text of the application illustrate a RAID (Redundant Array of Inexpensive Disks) switch 310 coupled to disks via a SCSI bus/SCSI bus interface. In other words, the recited bus is the bus between the "backend" switch and the disks.

The Examiner identifies Hipp (6,325,636) as providing the recited bus. In particular the Examiner states:

4. Applicant argued that Hipp does not disclose a bus. However, Hipp discloses a bus (fig. 1, backplane 34) between serverlets (fig. 1, items 32) and a disk system (item 54). In response to applicant's argument that the references fail to show certain features of applicant's invention, it is noted that the features upon which applicant relies (i.e., SCSI or PCI backplane) are not recited in the rejected claim(s). Although the claims are interpreted in light of the specification, limitations from the specification are not read into the claims. See *In re Van Geuns*, 988 F.2d 1181, 26 USPQ2d 1057 (Fed. Cir. 1993).

Applicants agree that Hipp discloses a bus, just not the recited bus. That is, the Examiner equates item 48 in FIG. 1 of Hipp (shown below) as the "first switching device" and item 54 in FIG. 1 of Hipp as the disk system 54. Backplane 34 (which the Examiner equates with the recited "bus") however does not connect item 48 and item 54. Instead, item 48 connects to item 54 via items 52, 53, and 62. Thus, backplane 34 does not constitute a bus "connecting the first switching device and the at least one disk system".

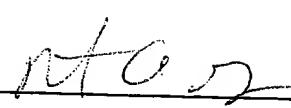


As such, Applicants respectfully request withdrawal of the rejection of claim 25 and its dependent claims.

Docket No.: 42390.P9956
Serial No.: 09/739,388

Respectfully submitted,

Dated: 11/16/05



Robert A. Greenberg
Reg. No. 44,133

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP
12400 Wilshire Blvd.
Seventh Floor
Los Angeles, CA 90025-1026
(503) 684-6200